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WATER QUALITY
CONTROL BOARD

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August 5, 2009

Executive Officer
San Diego Region
California Regional Water Quality Control Board
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4340

Dear Executive Officer:

In reply refer to:
CRU: Reg Measure ID 367377: MMATA

**SUBJECT: Comments on the Tentative Order No. R9-2009-00094
Discharges from Hydrostatic Test Water and Potable Water**

On behalf of Eastern Municipal Water District (EMWD), I would like to thank you for the opportunity to submit comments on the Tentative Order No. R9-2009-0094, Discharges from Hydrostatic Test Water and Potable Water. EMWD currently provides potable water and water reclamation services to an exponentially growing population of 650,000 people in a service area of 550 square miles. We support the Tentative Order as written and have only a couple of comments.

1. Page 7, Section D, 4th paragraph: "Therefore, at least 30 days prior to initiating a hydrostatic or potable water discharge to a MS4, the Discharger shall notify and received authorization from the appropriate local agency with jurisdiction over the MS4."

EMWD does not understand the need to have a 30-day notification for potable discharge. Situations requiring dewatering of potable pipelines and/or tanks often must be done rapidly. A five (5) day notification seems more reasonable for notification to the MS4 prior to initiating discharge.

2. Page 15 and 16, Section IV., paragraph B., G., & L.: The causes or exceedances of water quality objectives, Basin Plan, or water quality standards (designated beneficial uses and water quality objectives developed to protect beneficial uses) is prohibited.

According to MWD's Skinner Water Filtration Plant, potable water being delivered to local water agencies can exceed 500 mg/L Total Dissolved

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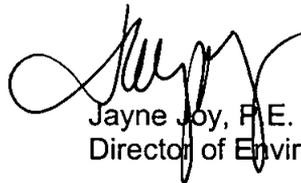
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Solids (TDS). Therefore, potable water in the hydrologic areas of Deluz, Auld, Pechanga and Wilson can exceed the water quality objectives of 500 mg/L TDS for potable discharges. No provisions have been given for source water exceedance within these areas when potable water is discharged. Therefore, EMWD requests that discharges in excess of the TDS limit that are due to the quality of the water supply sources utilized in the service area be exempt from this requirement.

Again, EMWD would like to thank you for the opportunity to comment on the Tentative Order. If you should have any questions, please feel free to contact Al Javier at (951) 928-3777 extension 6327.

Sincerely,



Jayne Joy, P.E.
Director of Environmental and Regulatory Compliance

AJ:tm

cc: Records Management

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